INTERROGATORY OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS TREWORGY

UPS/USPS-T22-12. Please refer to pages 2 through 4 of your direct testimony, where you discuss the purposes that the new scanners and the associated data system will serve. Have any estimates been prepared regarding the percent of (i) time, (ii) uses, (iii) benefit, or (iv) any other measure, that would accrue to each of the three identified purposes? If yes, please provide any such estimates. If no, can you estimate the percent of (i) time, (ii) uses, (iii) benefit, or (iv) any other measure, that would accrue to each of the three identified purposes?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

Stephanie Richman

Dated: September 17, 1997

Philadelphia, Pa.

BEFORE THE POSTAL RATE COMMISSION

RECEIVED

SEP 17 4 56 PM '97

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

SECOND SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS TREWORGY (UPS/USPS-T22-12)

(September 17, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Treworgy (UPS/USPS-T22-12).

Respectfully submitted,

John E. McKeever Albert P. Parker Stephanie Richman

Attorneys for United Parcel Service

Schnader Harrison Segal & Lewis LLP 1600 Market Street, Suite 3600 Philadelphia, PA 19103-7286 (215) 751-2200

and 1913 Eye Street, N.W., Suite 600 Washington, D.C. 20006-2106 (202) 463-2900

Of Counsel.